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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TRUSTEES OF THE NEVADA RESORT
ASSOCIATION-INTERNATIONAL
ALLIANCE OF THEATRICAL STAGE
EMPLOYEES AND MOVING PICTURE
MACHINE OPERATORS OF THE
UNITED STATES AND CANADA
LOCAL 720 PENSION TRUST;
TRUSTEES OF THE NEVADA RESORT
ASSOCIATION-INTERNATIONAL
ALLIANCE OF THEATRICAL STAGE
EMPLOYEES AND MOVING PICTURE
MACHINE OPERATORS OF THE
UNITED STATES AND CANADA
LOCAL 720 WAGE DISABILITY
TRUST; and TRUSTEES OF THE
NEVADA RESORT ASSOCIATION-
INTERNATIONAL ALLIANCE OF
THEATRICAL STAGE EMPLOYEES
AND MOVING PICTURE MACHINE
OPERATORS OF THE UNITED STATES
AND CANADA LOCAL 720
APPRENTICE AND JOURNEYMAN
TRAINING AND EDUCATION TRUST,

Plaintiffs,

vs.

ENCORE PRODUCTIONS, INC.,
a Nevada Corporation, EPI LEASING,
INC., a Nevada Corporation, ENCORE
PRODUCTIONS, INC., a Texas
corporation, and FREEMAN AUDIO

Case No. 2:10-cv-00386-GMN-VCF

**NOTICE OF SETTLEMENT AND
REQUEST TO STAY PROCEEDINGS**

BROWNSTEIN HYATT FARBER SCHRECK, LLP
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1 VISUAL SOLUTIONS, INC., a Texas
2 corporation,
3 Defendant.

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5 Plaintiffs, the Trustees of the Nevada Resort Association-International Alliance of
6 Theatrical Stage Employees and Moving Picture Machine Operators of the United States and
7 Canada Local 720 Pension Trust; Trustees of the Nevada Resort Association-International
8 Alliance of Theatrical Stage Employees and Moving Picture Machine Operators of the United
9 States and Canada Local 720 Wage Disability Trust; and Trustees of the Nevada Resort
10 Association-International Alliance of Theatrical Stage Employees and Moving Picture Machine
11 Operators of the United States and Canada Local 720 Apprentice and Journeyman Training and
12 Education Trust (collectively referred to as "IATSE Trust Funds") and Defendants, Encore
13 Productions, Inc., EPI Leasing, Inc., and Freeman Audio Visual Solutions, Inc. (collectively
14 referred to as "Defendants"), hereby give notice to the court that the parties have agreed to a
15 settlement in this case. The parties are in the process of finalizing formal settlement documents,
16 and request the Court stay all proceedings for 30 days, after which time, upon full and final

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1 settlement of the case, the Trust Funds and Defendants will file a stipulated dismissal.

2 Dated: February 17, 2012.

Dated: February 17, 2012.

3 BROWNSTEIN HYATT FARBER
4 SCHRECK, LLP

LITTLER MENDELSON

5 /s/ Adam Segal

/s/ Rick Roskelley

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14 *Attorneys for Plaintiffs*

*Attorneys for Defendants, Encore Productions,
Inc., EPI Leasing, Inc., and Freeman Audio
Visual Solutions, Inc.*

15 **ORDER**

16 **IT IS SO ORDERED** this 17th day of February, 2012.

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18 Gloria M. Navarro
19 United States District Judge
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